

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x  
IN RE: TERRORIST ATTACKS ON )  
SEPTEMBER 11, 2011 ) Civil Action No. 03 MDL 1570 (GBD) (SN)  
 )  
 )  
----- x

This document relates to:

*Abarca v. Kingdom of Saudi Arabia*, No. 17-cv-03887 (GBD)  
*Addesso v. Kingdom of Saudi Arabia*, No. 16-cv-09937 (GBD)  
*Aguilar v. Kingdom of Saudi Arabia*, No. 16-cv-09663 (GBD)  
*Aiken v. Kingdom of Saudi Arabia*, No. 17-cv-00450 (GBD)  
*Arrowood Indemnity Co. v. Kingdom of Saudi Arabia*, No. 17-cv-03908 (GBD)  
*Charter Oak Fire Ins. Co. v. Al Rajhi Bank*, No. 17-cv-02651 (GBD)  
*Hodges v. Kingdom of Saudi Arabia*, No. 17-cv-00117 (GBD)  
*Underwriting Members of Lloyd's Syndicates 2 v. Al Rajhi Bank*, No. 16-cv-07853 (GBD)  
*Abedhajajreh v. Kingdom of Saudi Arabia*, 17-cv-06123 (GBD) (SN)

**MOTION TO EXTEND *PRO HAC VICE* ADMISSIONS TO ALL  
CONSOLIDATED MDL CASES, AND NOTICES OF APPEARANCE**

Saudi Binladin Group (“SBG”) hereby moves this Court for an order extending the *pro hac vice* admissions of James E. Gauch, Mary Ellen Powers, and Fahad A. Habib (once his pending motion for admission *pro hac vice* is granted) to all cases consolidated into 03-MDL-1570 (GBD) (SN), a multi-district litigation (“MDL”) before this Court.

I, James E. Gauch, was admitted as counsel *pro hac vice* on March 12, 2004, for purposes of this MDL and Civil Action Nos. 02-cv-6977 and 02-cv-1616. *See* Dkt. 29. My colleague, Mary Ellen Powers, was admitted as counsel *pro hac vice* on August 17, 2005, for purposes of all cases pending in the MDL at the time. *See* Dkt. 1135.

As this Court is aware, numerous additional cases have been consolidated into this MDL in recent months. Moving for *pro hac vice* admission in each related case would be cumbersome

and would require repeated applications to the Court. SBG moves the Court to extend counsels' *pro hac vice* admissions to all cases consolidated into 03-MDL-1570, now or in the future, and to permit counsel to appear in the above-captioned cases by filing notices of appearance, and to do the same in other consolidated MDL cases as appropriate.

The relief requested here, moreover, follows similar relief granted by earlier orders of this Court as to Saudi Arabia's counsel Mark C. Hansen, Michael K. Kellogg and Gregory G. Rapawy. *See* Dkts. 3485, 3663.

SBG further requests that the Court enter James E. Gauch's and Mary Ellen Powers' appearances as its counsel in the above-captioned cases.

The motion for admission *pro hac vice* of Fahad A. Habib, on behalf of SBG, is currently pending before this Court. Dkt. 3685. SBG respectfully requests that, once that motion is granted, Fahad A. Habib's *pro hac vice* admission is extended to all cases consolidated into the above captioned MDL before this Court, now or in the future, and that the Court enter his appearance as SBG's counsel in the above-captioned cases.

In filing these appearances, SBG respectfully reserves all defenses and objections to these lawsuits, including without limitation objections to this Court's subject matter or personal jurisdiction.

Dated: August 18, 2017

Respectfully submitted,

By: /s/ James E. Gauch

James E. Gauch

Mary Ellen Powers

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001-2113

Tel: (202) 879-3939

Fax: (202) 626-1700

Email: [jegauch@jonesday.com](mailto:jegauch@jonesday.com)

*Counsel for Defendant Saudi Binladin  
Group*

**CERTIFICATE OF SERVICE**

I hereby certify that, on August 18, 2017, I caused an electronic copy of the foregoing motion to be served electronically pursuant to the Court's ECF system on all counsel of record.

*/s/ James E. Gauch*